

Early Case Assessment:
Employment Litigation

Fig. 1A
Prior Art

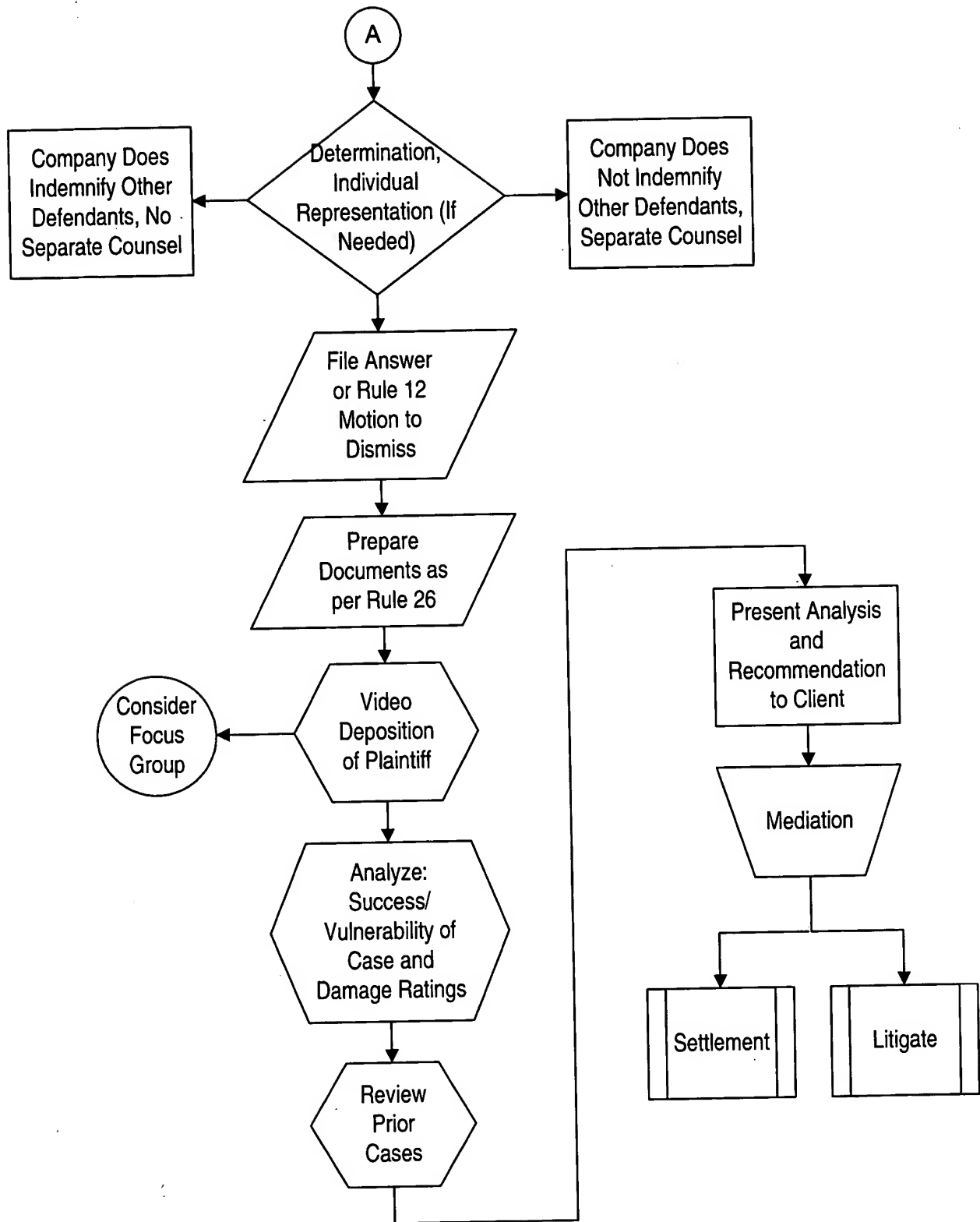


Fig. 1B
Prior Art

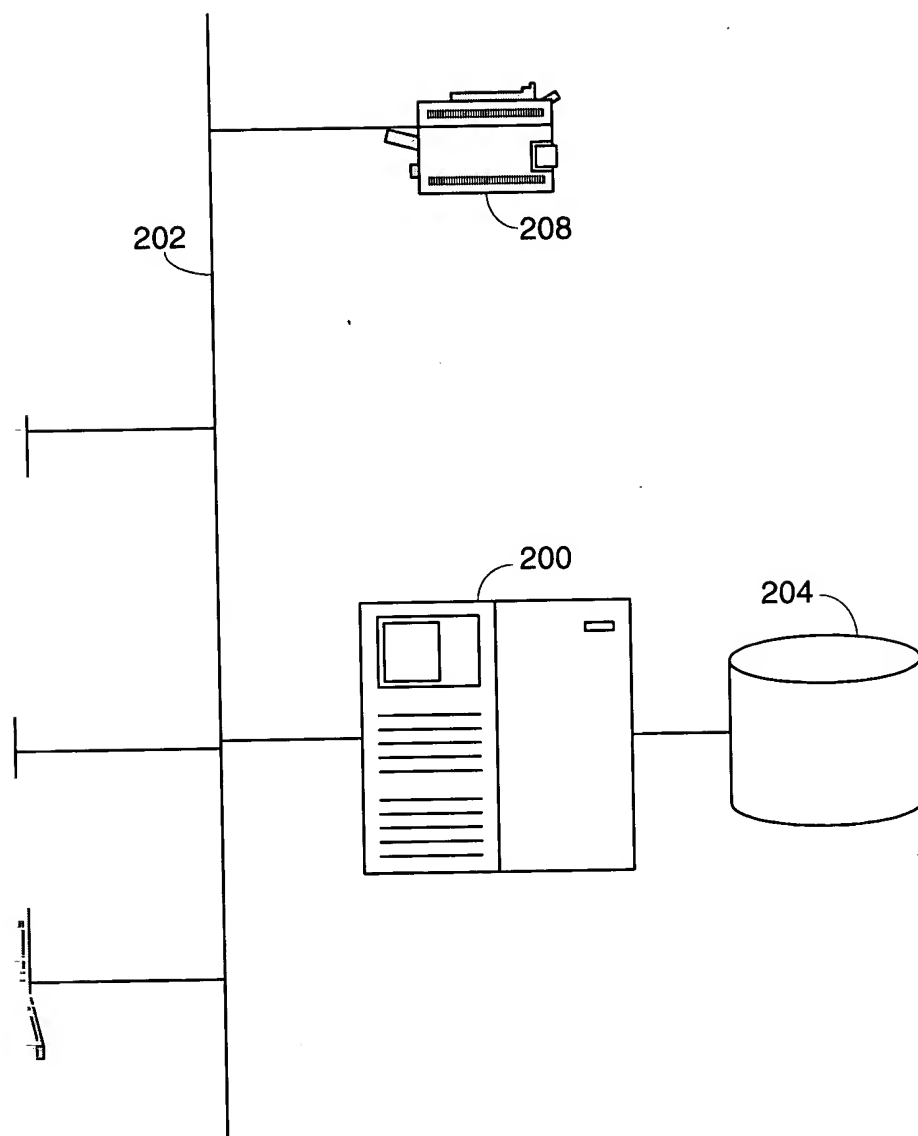


Fig. 2

TACTIX™

Attorney Client Communication / Attorney Work Product

Cases Administration About Tactix

☐ Show Historical

302

Name	Venue	Type	Open Date	Client
Brandt Rome v. Silicon Union, Corp.	N.D. California	Race / Failure to Hire	07/11/2003	Silicon Union, Corp.
Dana Webster v. Silicon Union, Corp.	M.D. Florida	Age / Termination	09/16/2002	Silicon Union, Corp.
Leonard Ball v. Wong, Cabello	E.D. Massachusetts	Race / Termination	09/17/2002	General Electric
Mitchel Burns v. Silicon Union, Corp.	S.D. New York	Race / Demotion	01/27/2003	Silicon Union, Corp.
Odessa Cotton v. Silicon Union, Corp.	S.D. Mississippi	Sex / Failure to Promote	11/18/2002	Silicon Union, Corp.
Patricia Norman v. Silicon Union, Corp.	C.D. California	Age / Demotion	12/09/2002	Silicon Union, Corp.
Terry Vasquez v. Silicon Union, Corp.	N.D. Georgia	National Origin / Termination	02/10/2003	Silicon Union, Corp.
Test Case			06/20/2002	General Electric
Test Case 2	Venue	Racial Termination	06/20/2002	General Electric
Tia Carrillo v. Wong, Cabello	E.D. Massachusetts	Race / Termination	06/20/2002	General Electric
Victoria Ennis v. Wong, Cabello	E.D. Virginia	Sex / Failure to Promote	06/20/2002	General Electric
William Windham v. Silicon Union, Corp.	N.D. California	Race / Termination	04/01/2003	Silicon Union, Corp.

302

Show Primary Contacts

Search:

Open

Vinnite 1.1.0.8

300

Fig. 3

William Windham v. Silicon Union, Corp.

Overview | Tasks | Proof Points | Damages | Players | Documents | Discovery Questions

Overview

Case Name: William Windham v. Silicon Union, Corp.

Client Company: Silicon Union, Corp.

Case Type: Race / Termination

Date Opened: 04/01/2003

Date Closed: (empty) click to edit...

Risk: 2 - Med

Case Summary: Test

Jury Theme: Plaintiff lied on his job application.

Critical Dates:

07/01/2003 Discovery request filing deadline
08/11/2003 Request for discovery documents due
09/09/2003 Prepare for research with MC's
10/20/2003 Request for production

Primary Contacts:

Cole, Edith In-House

Ricci, Howard Partner

Percentage Complete

Reliability

Recommendation

310

Go to Trial

306

308

Task List:

Task	Status	Assigned to
Review Complaint	In Progress	Associate Partner
Venue / Business Analysis	In Progress	Associate Partner
FOIA Request Task	In Progress	Associate Partner
Other Agency Document	On Hold	Associate Partner
Locus	On Hold	Associate Partner
Court admission	Not Started	Associate Partner
Analyze Local Rules	Not Started	Associate Partner
Legal Research	Not Started	Associate Partner
Evaluate Early Discovery	Not Started	Associate Partner
Jury Venire	Not Started	Associate Partner
Removal Analysis	Not Started	Associate Partner
Responsive Pleading	Not Started	Associate Partner
Transfer Analysis	Not Started	Associate Partner
Early Case Assessment	Not Started	

Admin...

Jury Theme: Plaintiff lied on his job application.

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TACTIX™

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Calendar

Discovery Generator

Close

William Windham v. Silicon Union, Corp.

Overview

Tasks

Proof Points

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Documents

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Task List

Review Complaint

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FOIA Request Task

Other Agency Document

Locus

Court admission

Analyze Local Rules

Legal Research

Evaluate Early Discovery

Jury Verdict

Removal Analysis

Responsive Pleading

Transfer Analysis

Early Case Assessment

Show All

Review Complaint

What date was service of complaint perfected?

03/31/2001

Identify all defendants and date of service:

Ryan Heaton

Defendant

Edit

Ralph Pendleton

Defendant

Edit

Charles Suffolk

Defendant

Edit

Add new player

Complete case information page.

Provide data box...

Are there any conflict of interest issues?

Yes

No

Explain:

Status:

In Progress

Resources

Associate

Reviewers

Palmer

Done?

Done?

Done?

Done?

View Log

Unlock

Update

Go to Proof Points to begin analysis of Plaintiff's claims.

<< Previous

Next >>

Jury Theme: Plaintiff lied on his job application.

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Fig. 5

TACTIX™

Attorney Client Communication / Attorney Work Product

Calendar

Discovery Generator

Close

William Windham v. Silicon Union, Corp.

Overview

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Locus

Court admission

Analyze Local Rules

Legal Research

Evaluate Early Discovery

Jury Venue

Removal Analysis

Responsive Pleading

Transfer Analysis

Early Case Assessment

Show All

Venue/Business Analysis

Question

Assessment

Parties

Does the community standing of any of the parties affect the defense of this case?

Favors Defendant

Favors Plaintiff

Judge

If the judge is known, will his/her leanings influence our defense of this case?

Favors Defendant

Jury Profile

How do you perceive the defense leanings for the average jury in this venue?

No Affect

Opposing Counsel

What is the likely impact of the opposing lawyer(s) on our successful defense of this case?

Favors Defendant

Appellate Courts

Based on the anticipated burden of proof and evidentiary issues known at this time, what effect will current appellate decisions have on the defense of this case?

Favors Defendant

Method and Timing of Discovery

Will the normal practice of this court regarding discovery help or hurt the defense of this case?

Favors Defendant

Timing to Trial

How will the normal time to trial in this court influence our defense of this case?

No Affect

Subpoena Power

If there are limitations on the range of subpoena service in this unit, how does that impact our defense?

Favors Plaintiff

Business Conditions

Are there business conditions affecting this case? If yes, what and how?

Status:

In Progress

Resources

Associate

Reviewer

Partner

Done?

Done?

Done?

View Log

Unlock

Update

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Next >>

Jury Theme: Plaintiff lied on his job application.

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Fig. 6

TACTIX

William Windham v. Silicon Union, Corp.

Attorney Client Communication / Attorney Work Product

Calendar Discovery Generator Close

Overview Tasks Proof Points Damages Players Documents Discovery Questions Show All

Task List

Review Complaint
Venue / Business Analysis
FOIA Request Task
Other Agency Document
Locus
Court admission
Analyze Local Rules
Legal Research
Evaluate Early Discovery
Jury Venue
Removal Analysis
Responsive Pleading
Transfer Analysis
Early Case Assessment

case?

If the judge is known, will his/her leanings influence our defense of this case?

Favors Plaintiff

1. Will the same judge be assigned to discovery, pre-trial, and trial of this case?

If yes,

1. Does the judge have a reputation for being pro-plaintiff or pro-defendant? If yes, which?
2. Does the judge have any political or social ties to the plaintiff's counsel, the defense counsel, or any party to the lawsuit? If so, describe.
3. Does the judge have any tendencies as to discovery issues that may affect our defense of this case? If yes, describe.
4. Does the judge have any tendencies as to trial evidence that may affect our defense of this case? If yes, explain.

If no,

1. Which judge will be assigned to each phase? If known,
2. Does the judge have any political or social ties to the plaintiff's counsel, the defense counsel, or any party to the lawsuit? If so, describe.
3. Does the judge have any tendencies as to discovery issues that may affect our defense of this case? If yes, describe.
4. Does the judge have any tendencies as to trial evidence that may affect our defense of this case? If yes, explain.

1. Are there any local customs

Status:

In Progress

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 7

TACTIX™

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William Windham v. Silcon Union, Corp.

Overview: Tasks | **Proof Points:** Damages | **Players:** Documents | **Discovery Questions:**

Task List

- Review Complaint
- Venue / Business Analysis
- FOIA Request Task
- Other Agency Document
- Locus
- Court admission
- Analyze Local Rules
- Legal Research
- Evaluate Early Discovery
- Jury Venue
- Removal Analysis
- Responsive Pleading
- Transfer Analysis
- Early Case Assessment

Show All

Calendar | **Discovery Generator** | **Close**

Status:

In Progress

Resources

Associate

Reviewers

Partner

Done?

☐

Done?

☐

View Log

Unlock

Update

Jury Profile

How do you perceive the defense team's leanings for the average jury in this venue?

What is the likely impact of the opposing lawyer(s) on our successful defense of this case?

Opposing Counsel

Favors Defendant

No Affect

reputation for using pro-plaintiff or pro-defendant? If yes, which?	disposition to educate?
<p>2. Does the judge have any political or social ties to the plaintiff's counsel, the defense counsel, or any party to the lawsuit? If so, describe.</p> <p>3. Does the judge have any tendencies as to discovery issues that may affect our defense of this case? If yes, describe.</p> <p>4. Does the judge have any tendencies as to trial evidence that may affect our defense of this case? If yes, explain.</p>	<p>1. Does the judge have a reputation for being pro-plaintiff or pro-defendant? If yes, which?</p> <p>2. Does the judge have any political or social ties to the plaintiff's counsel, the defense counsel, or any party to the lawsuit? If so, describe.</p> <p>3. Does the judge have any tendencies as to discovery issues that may affect our defense of this case? If yes, describe.</p> <p>4. Does the judge have any tendencies as to trial evidence that may affect our defense of this case? If yes, explain.</p>

Are there any local customs or practices in this court which may affect the defense of this case? Please explain.

If unknown,

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Fig. 8

TACTIX™

Attorney Client Communication / Attorney Work Product

Calendar

Discovery Generator

Close

William Windham v. Silicon Union, Corp.

Overview

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Locus

Court admission

Analyze Local Rules

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Early Case Assessment

Show All

Venue/Business Analysis

Question

Assessment

Does the community standing of any of parties the parties affect the defense of this case?

Favors Defendant

Favors Plaintiff

Favors Defendant

Judge

If the judge is known, will his/her leanings influence our defense of this case?

Favors Plaintiff

Favors Defendant

Jury Profile

How do you perceive the defense leanings for the average jury in this venue?

Favors Plaintiff

Favors Defendant

1. What geographic area will a jury venire be drawn from? Describe.

2. Is there a pro-plaintiff or pro-defendant trend in jury verdicts for case of this type in this venire? If yes, describe. Should we evaluate retaining a juror consultant?

3. Do we have demographic and/or socio-economic data for the average juror in this venire?

4. Are there any facts or circumstances now known about this case which indicate we do not want this case tried to a jury (i.e., reputation of defendant or plaintiff; medical condition of plaintiff; "bad actor" supervisor, etc.)? If yes, describe.

5. Are there any local or regional stories or current events that might be woven into the jury theme in this case to help explain the defendant's actions to a jury?

Opposing Counsel

What is the likely impact of the opposing lawyer(s) on our successful defense of this case?

No Affect

Appellate Courts

Based on the anticipated burden of proof and evidentiary issues known at this time, what effect will current appellate decisions have on the defense of this case?

Favors Defendant

Method and Timing of Discovery

Will the normal practice of this court regarding discovery help or hurt the defense of this case?

Favors Defendant

Timing to Trial

How will the normal time to trial in this court influence our defense of this case?

Favors Defendant

Status:

In Progress

Resources

Associate

Reviewers

Partner

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 9

TACTIX

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William Windham v. Silicon Union, Corp.

Calendar

Discovery Generator

Close

Overview

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Show All

Venue / Business Analysis

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Question

Assessment

Parties

Judge

Jury Profile

Opposing Counsel lawyer(s)

Appellate Courts

Method and Timing of Discovery

Timing to Trial

Subpoena Power

Business Conditions

Does the community standing of any of the parties affect the defense of this case?

If the judge is known, will his/her leanings influence our defense of this case?

How do you perceive the defense leanings for the average jury in this venue?

What is the likely impact of the opposing case?

Based on the anticipated burden of proof and evidentiary issues known at this time, what effect will current appellate decisions have on the defense of this case?

Will the normal practice of this court influence our defense of this case?

How will the normal time to trial in this court influence our defense of this case?

If there are limitations on the range of subpoena service in this unit, how does that impact our defense?

Are there business conditions affecting this case? If yes, what and how?

Favors Defendant

select

Strongly Favors Defendant

Favors Defendant

No Affect

Favors Plaintiff

Strongly Favors Plaintiff

Favors Defendant

Favors Defendant

Favors Defendant

No Affect

Favors Plaintiff

Status:

In Progress

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

<< Previous

Next >>

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 10

Calendar
Discovery Generator
Close

Damages | **Players** | **Documents** | **Discovery questions**

Show All

FOIA Request

Did Plaintiff file a charge of discrimination with the EEOC or state Fair Employment Practices (FEP) Agency?

 Yes

NO

Analyze Local Rules

Evaluate Early Discovery

Removal Analysis

Transfer Analysis

Early Case Assessment

1. AAVS-01 is a novel, highly sensitive, and specific assay for the detection of AAVS-01. It is a rapid, simple, and easy-to-use assay that can be performed in a laboratory setting. The assay is based on the principle of competitive binding, where the AAVS-01 antigen competes with a labeled antigen for the binding sites of the antibody. The assay is highly sensitive, with a detection limit of 10 pg/ml. The assay is also highly specific, with a specificity of 100%. The assay is easy to use, with a simple protocol that can be performed in a laboratory setting. The assay is a rapid, simple, and easy-to-use assay that can be performed in a laboratory setting.

Next >>

FOIA Request Open

Create new document

In Progress

Done?

business

Partner

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 11

William Windham v. Silicon Union, Corp.

Overview Tasks Proof Points

Task list

Review Complaint
Venue / Business Analysis
FOIA Request Task
Other Agency Document

Locus

**Court admission
Analyze Local Rules
Legal Research
Evaluate Early Discovery
Jury Verdict
Removal Analysis
Responsive Pleading
Transfer Analysis
Early Case Assessment**

Other Agency Document Request

Has Plaintiff filed a claim with any other governmental agency?

☒ Yes

CONC

Complete a request from the agency for all documents related to Plaintiff's claims.

Other Agency Documents

Create new document

Calendar 30 days to follow up on request:

<< Previous Next >>

Status:

On Hold

Resources

Associate

Reviewers

Partner

Done?

Done?

[View Log](#)

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Yinnie 1.1.0.3

Fig. 12

Calendar
Discovery Generator
close

[Damages](#)
[Players](#)
[Documents](#)
[Discovery questions](#)

Show All

Court Admission

Is counsel admitted in Court where complaint filed?

Yes

NO

☐ Obtain local counsel.

☐ If appropriate, seek pro hac vice admission in court.

« Previous Next »

100

100

☐ Obtain local counsel.

☐ If appropriate, seek

☐ If appropriate, seek pro hac vice admission in court.

« Previous Next »

Status:

Not Started

Resources

Associate

Reviewers

Part

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 14

William Windham v. Silicon Union, Corp.

Overview Tasks Proof Points Damages Players Documents Discovery Questions

Task List

Review Complaint

Venue / Business Analysis

FOIA Request Task

Locus

Court admission

Analyze Local Rules

Legal Research

Evaluate Early Discovery

Jury Venire

Removal Analysis

Responsive Pleading

Transfer Analysis

Early Case Assessment

What are Plaintiff's causes of actions?

Cause of Action

Applicable Statute of Limitations

Prima facie case

Leading cases with summary:

Date last updated

OK

Cancel

**Cause of
Action**

Applicable Statute of Limitations

Prima facie case

Leading cases with summary

Date last updated

☐ Review Proof Points and conduct research related to each of Plaintiff's claims

<< Previous

Status:

Not Started

Resources

Associate

Reviewers

Done?

Done?

[View log](#)

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 16

William Windham v. Silicon Union, Corp.

Overview Tasks

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Show All

Evaluate Early Discovery

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[Next >>](#)

Next >>

Status:

Not Started

Resources

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Partner

Done?

Done?

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Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 17

TACTIX™

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CalendarDiscovery GeneratorClose

William Windham v. Silfcon Union, Corp.

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Court admission

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Legal Research

Evaluate Early Discovery

Jury Venue

Removal Analysis

Responsive Pleading

Transfer Analysis

Early Case Assessment

Show All

Jury Venue

Obtain Information Regarding:

Plaintiff's counsel:

Name:

Law School:

Date of Admission to BAR:

Reported Cases:

Bar Discipline:

Other:

Judge:

Name:

Law School:

Date of Admission to BAR:

Reported Cases:

Bar Discipline:

Published Comments:

Appointing Authority:

Jury:

Review judgements in similar cases:

Size of community:

Perception of defendant in community:

Status: Not Started

Resources Associate Done?

Reviewers Partner Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Vinnie 1.1.0.8

Fig. 18

TACTIX™

Attorney Client Communication / Attorney Work Product

Calendar

Discovery Generator

Close

William Windham v. Sifcon Union, Corp.

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Show All

Removal Analysis

In what court was claim filed?

☒ State
 ☐ Yes
 ☐ No

Is there a basis for removal?

☐ Yes
 ☐ No

Is there diversity jurisdiction?

☐ Yes
 ☐ No

Is there federal question jurisdiction?

☐ Yes
 ☐ No

Categories

Decisions

Profile of the parties

(analysis)

select

Profile of the attorneys

(analysis)

select

Potential Juror Profile

(analysis)

select

Judicial profile

select

Status:

Not Started

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Vinnie 1.1.0.8

Fig. 19

Calendar
Discovery Generator
Close

Damages	Players	Documents	Discovery Questions
----------------	----------------	------------------	----------------------------

Show All

Judicial profile | select

select

10

Discovery Track

00000000000000000000

(analysis)

Evidentiary Issues: *Stave v. Federal*

(analysis)

Average time to trial | **select**

(analysis)

Subpoena power select

Analysis

Mechanics of Jury Selection, Voir Dire

(analysis)

Local rules/customs: **selection**

Not Started

Done?

Done?

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 20

(analysis)				
Subpoena power	select			
(analysis)				
Mechanics of Jury Selection, Voir Dire	select			
(analysis)				
Local rules/customs	select			
(analysis)				
Physical Facility	select			
(analysis)				

Is removal appropriate?

☒ Yes

☐ No

Recommendation **Remove**

Federal

[<< Previous](#)
[Next >>](#)

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Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 21

TACTIX™

Attorney Client Communication / Attorney Work Product

CalendarDiscovery GeneratorClose

William Windham v. Sificon Union, Corp.

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Removal Analysis
Responsive Pleading
Transfer Analysis
Early Case Assessment

Show All

Responsive Pleading

What is the appropriate responsive pleading in this case?
Answer

Percentage Complete35%
Reliability20%
RecommendationAnswer

Answer

Determine how much time Defendant has to answer.
Review all applicable statutes and local rules to determine proper format and content of the answer.
Consult all applicable ethical requirements, such as Federal Rule of Civil Procedure 11.
Investigate the facts alleged in the Complaint
Research the law relating to each claim and defense.
Draft answer and affirmative defenses.
Review specific issues related to answers.
- Do not default;
- Certain defenses and compulsory counterclaims may be waived if not raised with the answer, although leave to amend to add the allegation may be granted by the court FRCP 8(c), 12(h);
- The answer should proceed paragraph by paragraph to respond to the complaint and numbered accordingly;
- The possible responses are generally:
1) Admit;
2) Deny;
3) Insufficient information to form a belief.
- Defendant should deny any allegation that is not specifically admitted.
- Affirmative defenses: statute of limitations.
- Pleading special matters.
- 12(b) matters must be pleaded (failure to state a claim or lack of jurisdiction).

Status:Not Started

ResourcesAssociateDone?
ReviewersPartnerDone?

View LogUnlockUpdate

Jury Theme: Plaintiff lied on his job application.

Vinnie 1.1.0.8

Fig. 25

Fig. 26

Responsive Pleading

What is the appropriate responsive pleading in this case?

Answer

○ Motion to Dismiss

• Motion for a more definite statement

Motion for a more definite statement

On what basis is a motion for a more definite statement appropriate?

pleading is unintelligible

pleading is so hopelessly vague and ambiguous that a defendant cannot fairly be expected to respond or deny without risking prejudice.

pleading fails to properly allege facts that must be specially pleaded to support an award of special damages. RICO statements)

performance of documentary, of each strategy to determine threshold defenses exist (e.g., statute of limitations or statute of frauds).

Complete Motion for a more definite statement

2. Determine how much time Defendant has to file Motion for a more definite statement.

Consult all applicable ethical requirements, such as Federal Rule of Civil Procedure 11

Investigate the facts alleged in the Complaint

Research the law relating to each claim and defense

Check local service procedures

File and serve Motion for a more definite statement

[<< Previous](#)
[Next >>](#)

Status:

Not Started

Resources

Associate

Reviewers

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 27

What is the appropriate responsive pleading in this case?

- ☐ Answer
- ☐ Motion to Dismiss
- ☒ Motion for a more definite statement

Motion for a more definite statement

On what basis is a motion for a more definite statement appropriate?

pleading is unintelligible.

pleading is so hopelessly vague and ambiguous that a defendant cannot fairly be expected to make a response or denial without risking prejudice.

pleading fails to properly allege facts that must be specially pleaded (e.g., fraud, mistake, venial or performance or occurrence, special damages, RICO statements):

pleading fails to provide facts necessary to determine threshold defenses exist (e.g., statute of limitations or statute of frauds).

Complete Motion for a more definite statement

Determine how much time Defendant has to file Motion for a more definite statement.

Consult all applicable ethical requirements, such as Federal Rule of Civil Procedure 11

Investigate the facts alleged in the Complaint

Research the law relating to each claim and defense:

Research in law leading to...

Check local service procedures.

File and serve Motion for a more definite statement.

[illegible]

Next >>

100

1

100

Fig. 28

TACTIX™

Attorney Client Communication / Attorney Work Product

Calendar

Discovery Generator

Close

William Windham v. Sificon Union, Corp.

Overview

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Locus

Court admission

Analyze Local Rules

Legal Research

Evaluate Early Discovery

Jury Venue

Removal Analysis

Responsive Pleading

Transfer Analysis

Early Case Assessment

Show All

Early Case Assessment

Case Number

Matter Number

Date

Parties - Comments

Related Litigation

Background

Allegations

Defenses

Damages

Court - Comments

Status:

Not Started

Resources

Reviewers

Done?

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Vinnie 1.1.0.8

Fig. 29

William Windham v. Silicon Union, Corp.

Attorney Client Communication / Attorney Work Product

Close

Overview Tasks Proof Points

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Locus
Court admission

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Legal Research

Jury Venire

Removal Analysis

Transfer Analysis

Early Case Assessment

Show All

Court - Comments

Judge Profile

Opposing Counsel - Comments

Key Defendant Witnesses

Key Documents

Key Dates

Opposing Trial Themes

Trial Themes

Status:

Not Started

Resources

Reviews

▲

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Yinnie 1.1.0.8

Fig. 30

Status:	
Not Started	▶
Resources	Done?
Reviewers	Done?

View Log

<< Previous Next >>

Update

[illegible]

Fig. 31

TACTIX™

Attorney Client Communication / Attorney Work Product

William Windham v. Silicon Union, Corp.

Overview

Tasks

Proof Points

Initial Component

Calendar

Discovery Generator

Close

Termination

Charge

Comparator

Decisionmaker

Legitimate Non-discriminatory

Discriminatory Statements

Pretext

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What are Plaintiff's claims?

☐ Discrimination

☐ FMLA

☐ Equal Pay Act

☐ FLSA

☐ Section 1981

☐ Section 1985

☐ State Claims

☐ Other:

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Jury Theme: Plaintiff lied on his job application.

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Fig. 32

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William Windham v. Sificon Union, Corp.

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What are Plaintiff's claims?
☒ Discrimination

Based on what protected category?
☒ Race

What adverse action is alleged?
☐ Failure to Hire
☐ Failure to Promote
☐ Demotion
☒ Termination
☐ Reduction in Force
☐ Harassment
☐ Other:

What is Plaintiff's race?
☒ African American
☐ Hispanic
☐ Caucasian
☐ Asian
☐ Native American
☐ Middle Eastern
☐ Other:

Status:
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☐ Sex
☐ National Origin
☐ Religion
☐ Retaliation (Whistleblower)

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Jury Theme: Plaintiff lied on his job application.

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Fig. 34

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What are Plaintiff's claims?

☒ Discrimination

Based on what protected category?

☐ Race

☒ Sex

What adverse action is alleged?

☐ Failure to Hire

☐ Failure to Promote

☐ Demotion

☒ Termination

☐ Reduction in Force

☐ Harassment

☐ Other:

What is Plaintiff's race?

☐ Male

☐ Female

Status:

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Religion

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What are Plaintiff's claims?

☒ Discrimination

Based on what protected category?

☐ Race

☐ Sex

☒ National Origin

What adverse action is alleged?

☐ Failure to Hire

☐ Failure to Promote

☐ Demotion

☒ Termination

☐ Reduction in Force

☐ Harassment

☐ Other:

What is Plaintiff's National Origin?

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Jury Theme: Plaintiff lied on his job application.

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Fig. 36

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What are Plaintiff's claims?

☒ Discrimination

Based on what protected category?

☐ Race
☐ Sex
☐ National Origin
☐ Religion
☐ Retaliation (Whistleblower)
☒ Disability

What adverse action is alleged?

☐ Failure to Hire
☐ Failure to Promote
☐ Demotion
☒ Termination
☐ Reduction in Force
☐ Harassment
☐ Failure to Accommodate
☐ Other:

Is Plaintiff's disabled?

☒ Yes
☐ No
☐ Age
☐ Sexual Orientation
☐ Other:

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Fig. 37

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What are Plaintiff's claims?

☒ Discrimination

Based on what protected category?

☐ Race☐ Sex☐ National Origin☐ Religion☐ Retaliation (Whistleblower)☐ Disability☒ Age

What adverse action is alleged?

☐ Failure to Hire☐ Failure to Promote☐ Demotion☒ Termination☐ Reduction in Force☐ Harassment☐ Other:

What is Plaintiff's Age?

☐ Sexual Orientation☐ Other:

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Jury Theme: Plaintiff lied on his job application.

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Fig. 38

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From what position was Plaintiff terminated?

Quality Assurance Manager

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Jury Theme: Plaintiff lied on his job application.

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What tasks were critical to the Plaintiff's job?

University graduates in Engineering or Computer Science At least 3 years relevant experience in QA in SW eamp; HW and/or project management Set quality requirements eamp; standards to ensure highest branded product quality eamp; customer satisfaction Experience in product packaging eamp; documentation

Practice Pointer

Written job descriptions often differ from the actual tasks performed on the job. It is important to understand what tasks the job actually requires, how a plaintiff performed those tasks and, if appropriate, what performance issues the plaintiff had or created.

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Fig. 40

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[3 of 9] Job Duties

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Is there any disagreement that Plaintiff was qualified for the position from which he was terminated?

☒ Yes

☐ No

Explain the disagreement:

Co-workers and peer managers were skeptical of plaintiff's claim to have attended the Univ. of Arkansas.

Practice Pointer

Co-workers are powerful witnesses at trial. It is important to determine how co-workers assess the plaintiff's qualifications to perform, especially if management's view is subjective or influenced by personal bias toward the plaintiff.

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Fig. 41

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[4 of 9] Reason

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What was the reason given for plaintiff's termination?

☐ Theft

☐ Violation of drug/alcohol policy

☐ Violation of Technology Use policy

☐ Insubordination

☐ Attendance

☐ Poor quality work

☒ Other:

Plaintiff misrepresented his completion of a college degree.

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Fig. 42

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[5 of 9] Reasons

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Explain each factor and circumstance that supports the plaintiff's termination:

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Fig. 43

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[6 of 9] Basis

Was the reason for plaintiff's termination objective, subjective or both?

☒ Objective

☐ Subjective

☐ Both

Explain:

A college degree is clearly stated to be a requirement for the plaintiff's job position. Plaintiff originally represented that he had a college degree. When challenged by the HR manager to produce a diploma, plaintiff was unable to do so. Subsequent check by HR manager with the college plaintiff said he graduated from showed no record of plaintiff obtaining a college degree there.

Practice Pointer

Subjective judgment supporting an adverse employment action is often valid but frequently attacked as being influenced by a manager's bias. John was fired because he had a "bad attitude" is subjective. John was fired after he "admitted to stealing \$10,000" is not. Absent clearly defined and observed violations of stated rules or policy, a decision to discipline or terminate based solely on a manager's opinion of the plaintiff's performance will be subject to attack. Plaintiff's counsel will seek to establish that the subjective decision was both illegal and "unfair." Even if plaintiff cannot show a prima facie case as a matter of law, experienced plaintiff's counsel will seek to create disputes over "material issues of fact" to defeat the company's motion for summary judgment. Since juries almost always read sympathetically to "unfair treatment," plaintiff's counsel will attempt to show that the plaintiff was a victim of one or more unfair and/or illegal patterns of company conduct. See Common Jury Themes for Plaintiffs. Objective decisions are normally based on first-hand observation of an established rule violation or measured results of the rule violation. The more objective the basis for the decision is, the harder it will be to create a genuine issue of material fact to defeat summary judgment. Stated differently, subjective management decisions are harder to defend, often regaining defendants to analyze much more evidence to explain and defend the adverse employment action.

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[7 of 9] Consistency

Is there evidence which may be inconsistent with the decision to terminate Plaintiff?

☒ Yes

ONC

What is the inconsistent evidence?

- ☐ Evidence which contradicts version of evidence relied upon by decisionmaker to terminate Plaintiff
- ☐ Evidence of inconsistent enforcement of rules (more lenient treatment of others)
- ☐ Third-party or co-worker statement supporting Plaintiff's version
- ☐ Other evidence from which a discriminatory intent can be inferred. (e.g., racial epithets, graffiti)
- ☐ Prior complaints of discrimination to EEOC, state agency, internal EEO office, or union
- ☐ Other:

Explain:

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Fig. 45

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[8 of 9] Replacement

Did anyone replace Plaintiff?

☒ Yes

☐ No

What is the replacement's name?

Ralph Pendleton

When did the replacement occur?

12/16/2001

Is Plaintiff likely to argue the replacement is not qualified?

☒ Yes

☐ No

Explain:

Replacement is caucasian and has fewer years job experience than plaintiff. However, replacement has a college degree.

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Fig. 46

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Fig. 48

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[1 of 6] Charge

Has Plaintiff filed a charge of discrimination with regard to this allegation?

☒ Yes

☐ No

Date of Charge

03/21/200

Date of First Adverse Action

11/29/200

Date of Last Adverse Action

11/29/200

Adverse Action Alleged

Termination

Based on what protected category

Race

Does jurisdiction have a state agency?

☒ Yes

☐ No

300 days prior to date of charges would be:

Are the adverse actions alleged within the 300 day timeframe?

☐ Yes

☐ No

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Fig. 49

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[2 of 6] Charge

What is the allegedly adverse action alleged in the charge of discrimination?

☐ Failure to hire

☐ Failure to promote

☐ Demotion

☒ Termination

☐ Reduction in Force

☐ Failure to hire

☐ Failure to accommodate

☐ Other:

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Fig. 50

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[3 of 6] Charge

When did the allegedly adverse action take place?

11/29/2001

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Jury Theme: Plaintiff lied on his job application.

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Fig. 51

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Is this consistent with claims in the lawsuit?

yes

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[4 of 6] Charge

Is this consist

☐ Yes

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Fig. 53

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[5 of 6] Charge

What date was the charge of discrimination filed.

3/21/2003

Practice Pointer

Determine whether the lawsuit was filed within the statute of limitations.

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Fig. 54

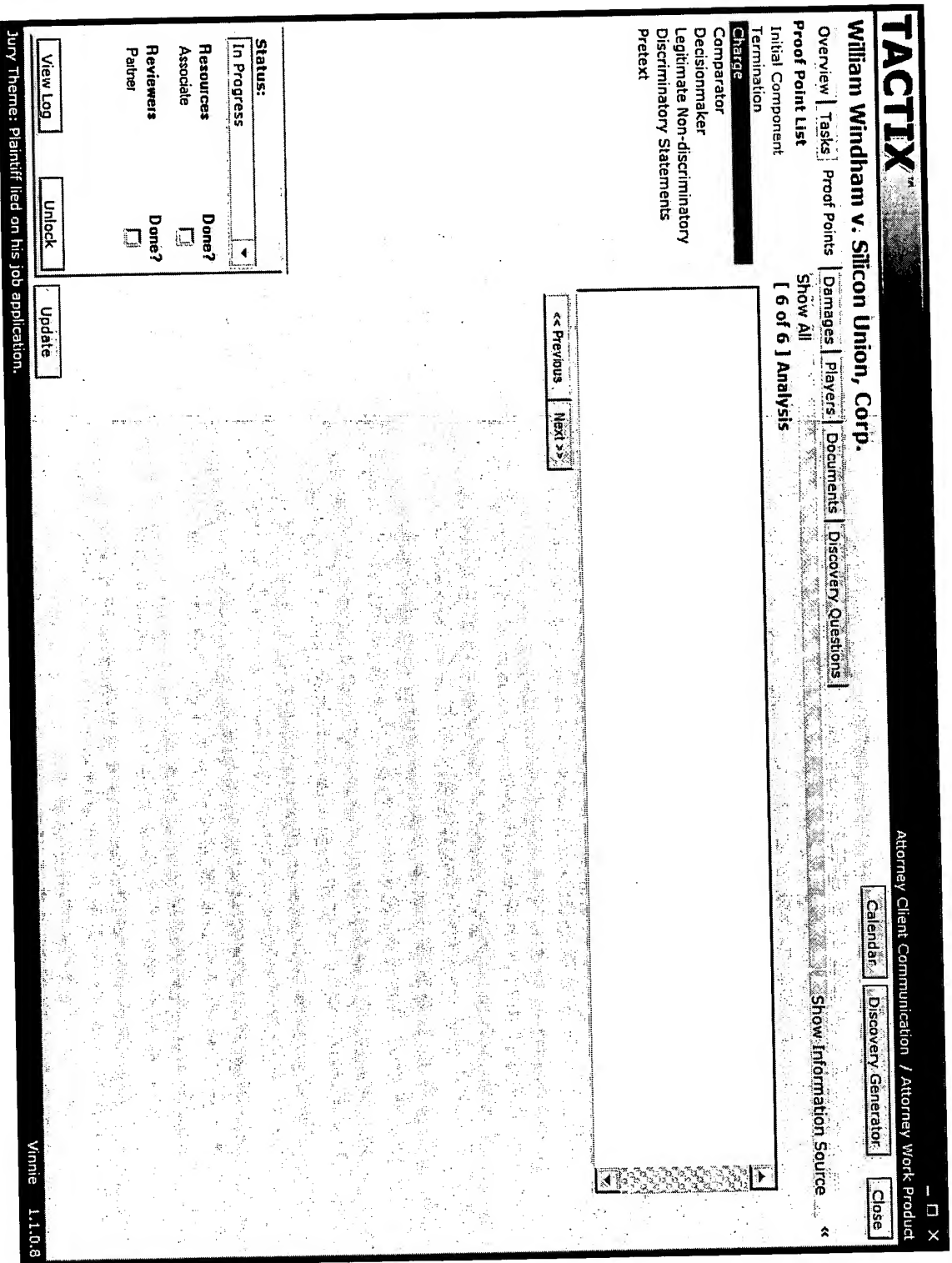


Fig. 55

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[1 of 6] Comparator

Who appear to be logical comparators to Plaintiff?

☐ Employees in Plaintiff's Department

☒ Employees in Plaintiff's Job classification

☐ Employees working for Plaintiff's supervisor

☐ All hourly employees?

☐ All salaried employees

☐ All employees at the facility

☐ All employees working for employer

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Jury Theme: Plaintiff lied on his job application.

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Fig. 56

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☐ Identify all comparators and provide background:

Ryan Heaton Comparator Edit Comparator Data Add new player

Have any of the comparators engaged in conduct similar to the conduct for which Plaintiff was terminated?

☒ Yes

ON

☐ Generate Comparator Worksheet

Comparator Worksheet.doc Open
Create new document

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Jury Theme: Plaintiff lied on his job application.

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Fig. 57

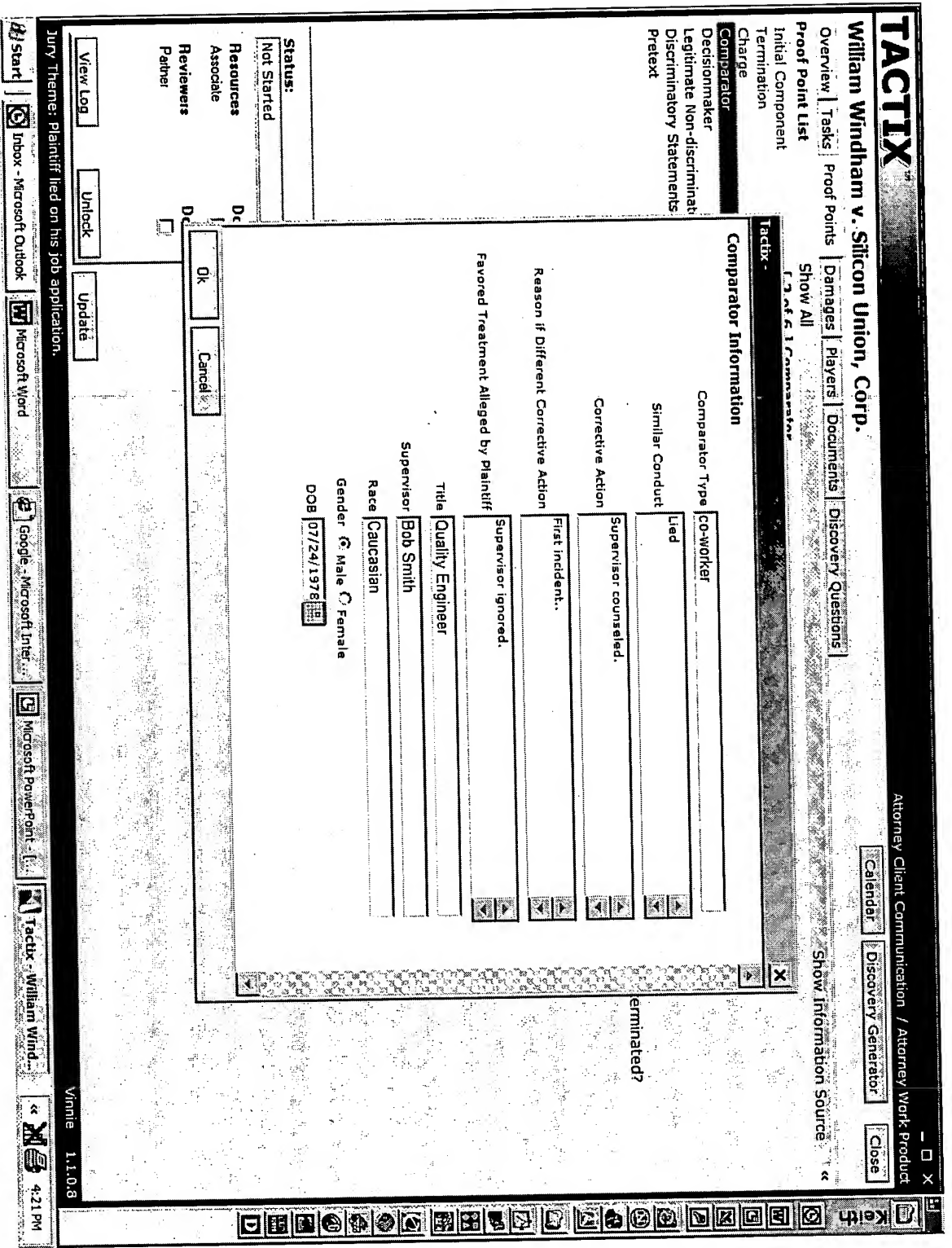


Fig. 58

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[3 of 6] Comparator

Provide each similarly situated comparator's name, address, job title, supervisor's name, race, gender, describe similar conduct, corrective action taken against this co-worker.

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[4 of 6] Comparator

Any difference in corrective action taken?

☒ Yes

☐ No

Reason for difference:

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[1 of 12] Decisionmaker

Who does the company contend made the final decision to take the adverse action against plaintiff?

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Does Plaintiff contest this determination?

☒ Yes ☐ No

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Fig. 64

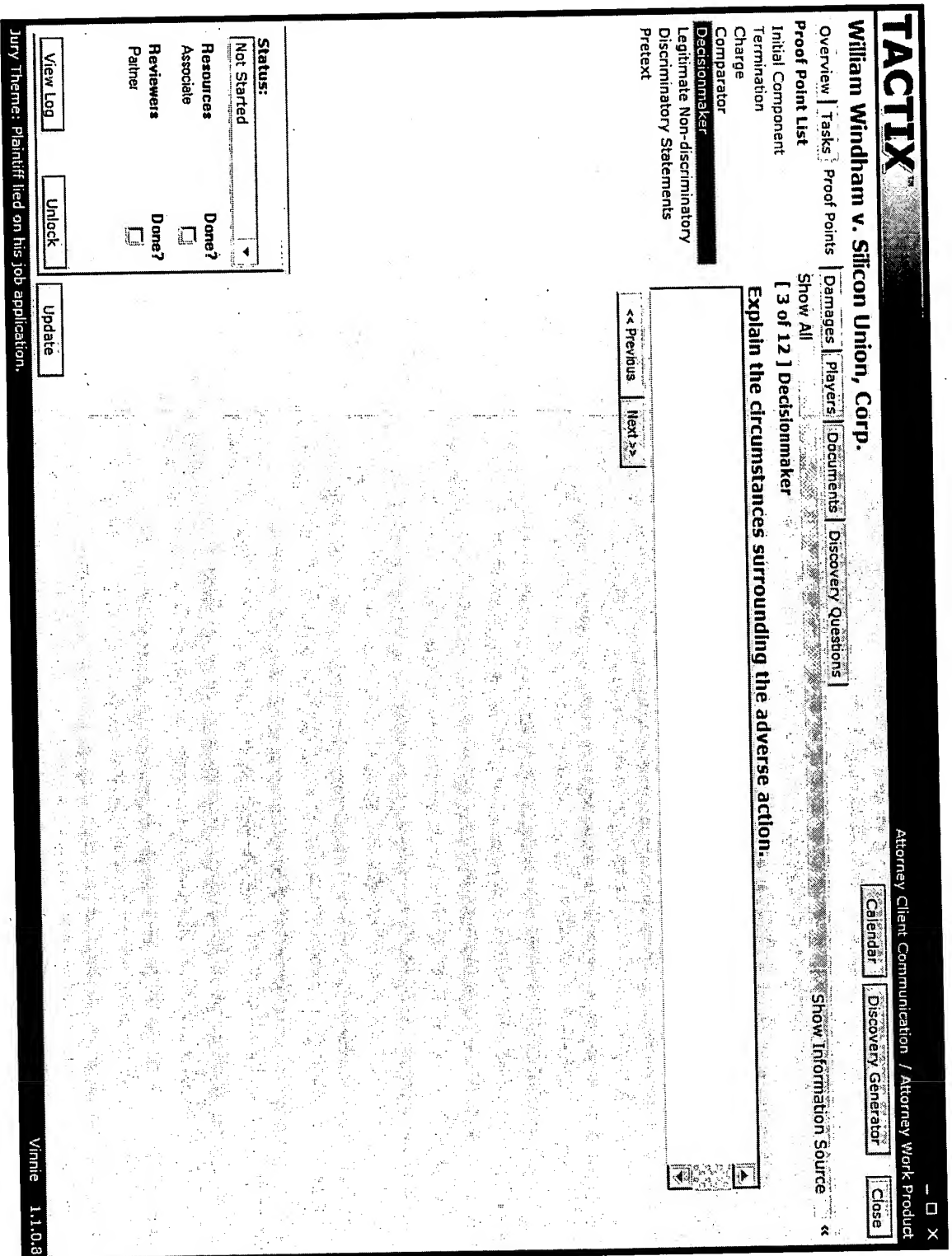


Fig. 65

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Are the reasons for th

☒ Yes ☐ No

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Fig. 66

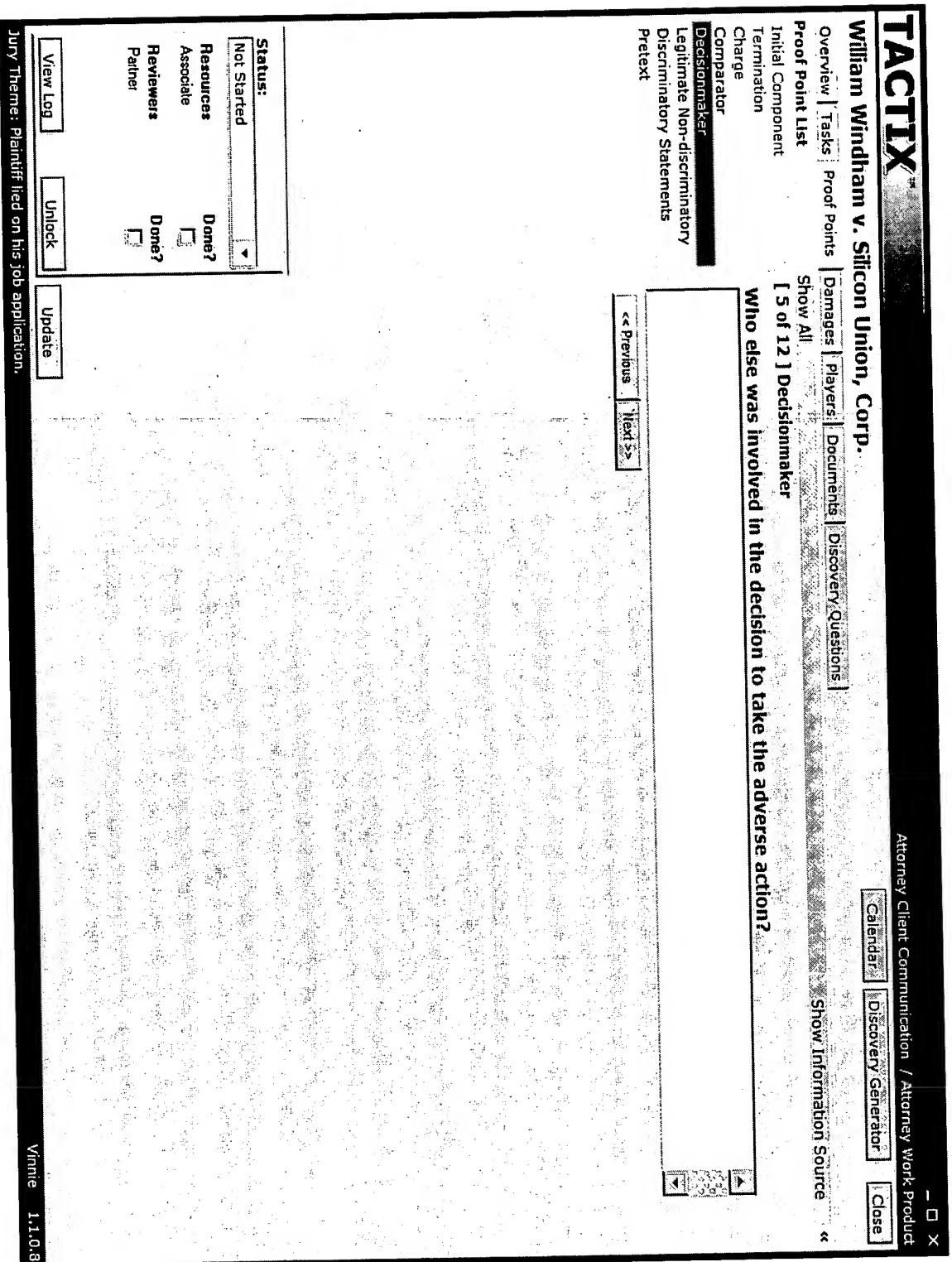


Fig. 67

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[6 of 12] Decisionmaker

Was anyone else involved in the decision?

☒ Yes ☐ No

Who:

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[7 of 12] Decisionmaker

When was the decision made?

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Jury Theme: Plaintiff lied on his job application.

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Fig. 69

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[8 of 12] Decisionmaker

When was Plaintiff told of the decision?

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Reviewers Partner Done?

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Fig. 70

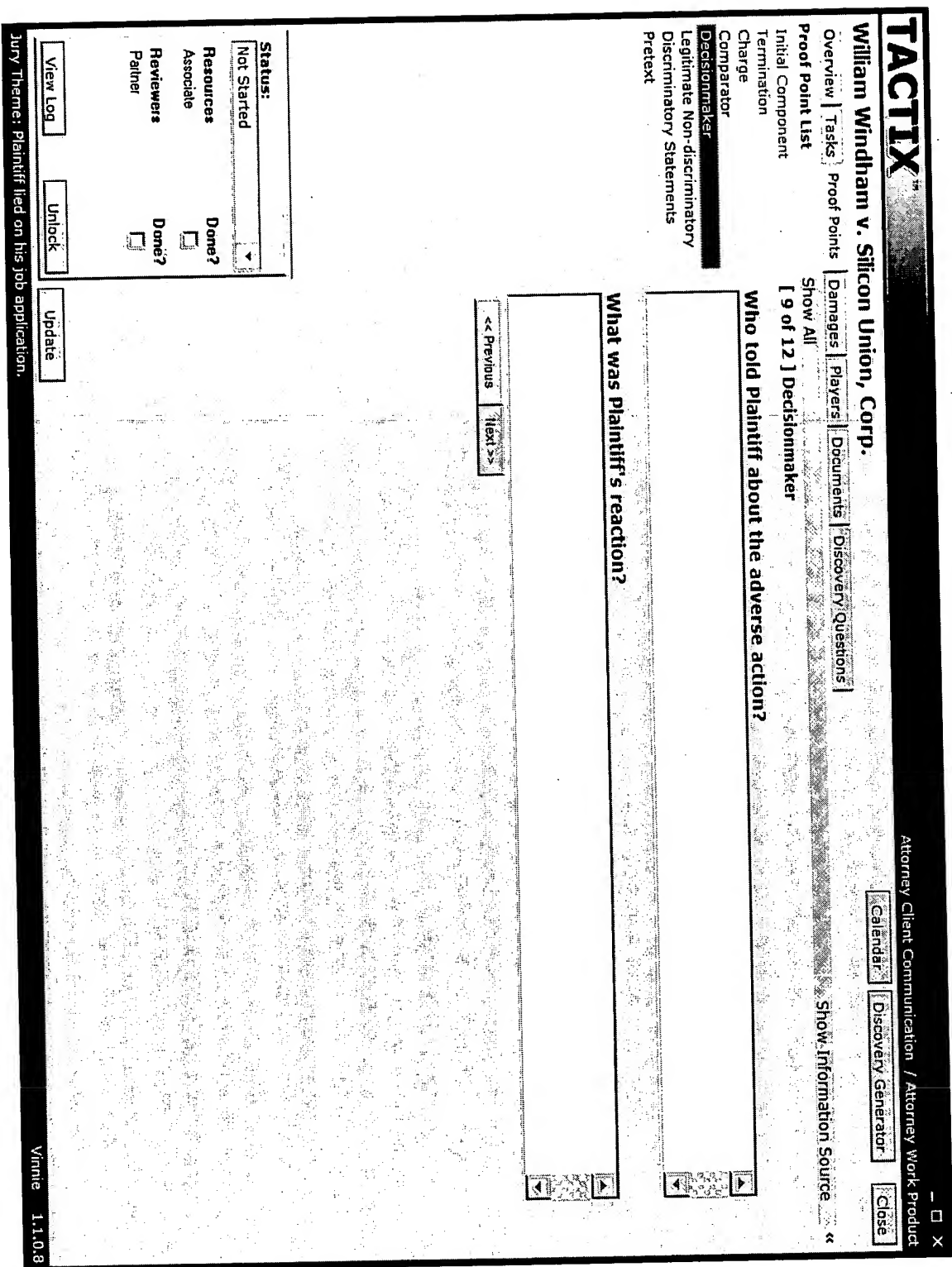


Fig. 71

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[10 of 12] Decisionmaker

Were any of the decisionmakers involved in the decision to hire or promote Plaintiff?

☒ Yes ☐ No

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Status: Not Started

Resources

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Fig. 72

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[12 of 12] Decisionmaker

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Have any of the decisionmakers been accused (formally or informally) of unfair treatment in the past?

☒ Yes ☐ No

Explain:

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Status: Not Started

Resources

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Reviewers

Partner

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Fig. 74

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[1 of 3] Legitimate Non-discriminatory reason

Based on the information collected to date, is there a basis for concern that the stated reason for the adverse action could be seen as discriminatory?

☐ Yes

☒ No

Explain:

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Status:

Not Started

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

Jury Theme: Plaintiff lied on his job application.

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Fig. 75

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[2 of 3] Legitimate Non-discriminatory reason

Have you uncovered any evidence that suggests other reasons for the adverse action?

☒ Yes

Q No

Explain:

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Status:

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Jury Theme: Plaintiff lied on his job application.

Vinnie 1.1.0.8

Fig. 76

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- Legitimate Non-discriminatory**
- Discriminatory Statements
- Pretext

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[3 of 3] Legitimate Non-discriminatory reason

Based on the information collected to date, is there a basis for concern that this alternative reason could be seen as discriminatory?

☐ Yes

☐ No

Explain:

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Status:

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Jury Theme: Plaintiff lied on his job application.

Fig. 77

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[2 of 3] Discriminatory Statements

Was the statement made during the same time period as the decision to terminate plaintiff?

☒ Yes☐ No

Explain:

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Status:Not Started

ResourcesIn-HousePartnerDone?Done?

ReviewersIn-HousePartnerDone?Done?

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Fig. 79

Calendar Discovery Generator close

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[3013] Discrimination; Decemenns

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Journal of Management Education 35(10) 1121-1136

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[illegible]

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In-House

Partner

Reviewers

In-House Partner

...

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Jury Theme:

1

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Fig. 80

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[1 of 3] Pretext

Is there enough information to evaluate the strength of Plaidin's piece of argument?

Yes

NO

Specify calendar date to re-evaluate Plaintiff's pretext argument.



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Status:

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References

Associate

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Done?

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Jury Theme: Plaintiff lied on his job application.

Fig. 81

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Pretext

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[2 of 3] Pretext

What is Plaintiff's pretext argument:



Explain:

Issue:

Rule:

Analysis:

Conclusion:

Status:	Not Started
Resources	Done?
Associate	
Reviewers	Done?
Partner	

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Fig. 82

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[3 of 3] Pretext

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What are Defendant's arguments counter to Plaintiff's pretext argument:

Explain:

Issue:

Rule:

Analysis:

Conclusion:

Status:

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Fig. 83

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Damages List

Prior to Employment Change

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

Social Security

Show All

Prior to Employment Change Information

Prior to the employment change, was the plaintiff classified as exempt or non-exempt?

☒ Exempt

☐ Non-exempt

Prior to the employment change, what was Plaintiff's job title and job level rating?

Quality Assurance Manager

Prior to the employment change, what was Plaintiff's salary? US\$

55,000

Analysis:

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Status:

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Jury Theme: Plaintiff lied on his job application.

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Fig. 84

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Prior to Employment Change

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

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Job Title

Salary

Reason for change

Date	Job Title	Job Description	Salary	Reason for change
06/03/2002	Quality Assurance Manager	University graduates in Engineering or Computer Science At least 3 years relevant experience in QA in SW eamp; HW and/or project management Set quality requirements eamp; standards to ensure highest branded product quality eamp; customer satisfaction Experience in product packaging tasks eamp; documentation able to handle multiple communicator and team builder result oriented and aggressive	55,000	Assigned as interim manager while HR search for full time replacement takes place.
04/02/2001	Sr. QA Engineer	Set quality requirements & standards to ensure highest branded product quality & customer satisfaction Experience in product packaging & documentation	50,000	

Analysis:

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Status: In Progress

Resources Associate Done? ☐

Reviewers Partner Done? ☐

Jury Theme: Plaintiff lied on his job application.

Fig. 86

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Status:

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Associate

Reviewers

Partner

Done?

Done?

Done?

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Jury Theme: Plaintiff had on his job application.

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[1 of 2] Retirement Benefits

Does Plaintiff have retirement benefits?

☒ Yes

☐ No

Type of retirement benefits

	Employer	Employee	Total
<input checked="" type="checkbox"/> Defined Benefit Plan	20500	5500	26000
<input type="checkbox"/> Defined Asset Plan			0
<input type="checkbox"/> 401k			0
<input type="checkbox"/> Stock Purchase			0
<input type="checkbox"/> Other			0
Total Retirement Benefits	28000	13000	41000

Calculate

Did the employment change affect the level of the employer's participation in the retirement plan?

☒ Yes

☐ No

Explain

Termination disqualified matching 401k contributions by company.

Did the employment change cause plaintiff to draw upon the retirement plan?

☐ Yes

☒ No

Explain

Update

Vinnie 1.1.0.8

«

Fig. 87

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Other

Calculate

100

Does the change affect the level of the employer's participation in the retirement plan?

Midline

C

20

Explain **disqualified matching 401k contributions by company.**

Termination disqualifies matching from consideration.

[illegible]

100

Did the employment change cause Plaintiff to draw upon the retirement plan?

C. Yes

ON

Explain

100

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DOI: 10.1177/0886260513509001
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Has the plaintiff elected to receive accelerated retirement payments?

Yes

© No

1

Explain

1

[illegible]

<< Previous

10

100

Update

Jury Theme: Plaintiff lied on his job application.

Yinnie 1.1.0.8

Fig. 88

TACTIX™

Attorney Client Communication / Attorney Work Product

William Windham v. Silicon Union, Corp.

Overview

Tasks

Proof Points

Damages

Players

Documents

Discovery

Questions

Calendar

Discovery Generator

Close

Damages List

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

Social Security

Damage?

Associate

Reviewer

Partner

Damage?

Damage?

Damage?

Status:

In Progress

View Log

Unlock

Update

Show All

Show Information Source

Explain

Termination disqualified matching 401k contributions by company.

Did the employment change cause Plaintiff to draw upon the retirement plan?

☐ Yes

☒ No

Explain

Has the Plaintiff elected to receive accelerated retirement payments?

☒ Yes

☐ No

How much is Plaintiff receiving? (US\$):

How much would Plaintiff have received if he had not accelerated his pension payments? (US\$):

Explain

<< Previous

Next >>

Jury Theme: Plaintiff lied on his job application.

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Fig. 89

TACTIX

Attorney Client Communication / Attorney Work Product

William Windham v. Silicon Union, Corp.

Overview | Tasks | Prof Points

Damages List

Prior to Employment Change

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

Social Security

Show All

[2 of 2] Benefits

If plaintiff would have been able to complete employment with the company until retirement at last job position, what would the monthly pension payment be?
US\$:

For life expectancy purposes, what is plaintiff's gender?

☒ Male

☐ Female

Other Benefits:

Type

Employer

Employee

Ok

Cancel

Type	Employer	Employee	Total	Vision plan	Accidental Death	Dependent Care	Dependent Life	Flexible Spending Account
Health Insurance	Dental Insurance	Life Insurance	Stock Options	Calculate				
Total								

Status:

In Progress

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

Check all that apply:

☐ Health Insurance

☐ Dental Insurance

☐ Life Insurance

☐ Stock Options

☐ Vision Plan

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 90

TACTIX™

Attorney Client Communication / Attorney Work Product

William Windham v. Sificon Union, Corp.

Overview | Tasks | Proof Points

Damages List

Prior to Employment Change

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

Social Security

Show All

Damages | Players | Documents | Discovery Questions

Show Information Source

Calendar

Discovery Generator

Close

Employer
Employee

OK Cancel

Type	Employer	Employee	Total	Vision Plan	Accidental Death	Dependent Care	Dependent Life	Dependent	Flexible Spending Account
Health Insurance	Dental Insurance	Life Insurance	Stock Options						
Total				Calculate					

Check all that apply:

- ☐ Health Insurance
- ☐ Dental Insurance
- ☐ Life Insurance
- ☐ Stock Options
- ☐ Vision Plan
- ☐ Accidental Death
- ☐ Dependent Care
- ☐ Dependent Life
- ☐ Flexible Spending Account
- ☐ Other:

Analysis

<< Previous Next >>

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

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Fig. 91

William Windham v. Silicon Union, Corp.

Overview | Tasks | Proof Points | Damages | Players | Documents | Discovery Questions |

Show Information Source

Damages List

Prior to Employment Change

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

Social Security

Show All

Other Income / Mitigation

Did Plaintiff receive any incentive to accept the employment change?

Please check all that apply:

☐ Severance Pay☐ Extra Training☐ Increased Salary☐ Other:

Describe Plaintiff's employment since the employment change.

Employer: When start: Title: duties: Supervisor: Salary: Benefits: Retirement plan/pension: Profit sharing: Insurance: Bonuses: Date of Separation:

Status:

Not Started

Resources

Associate

Reviewers

Palmer

Done?

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 92

Calendar

Discovery Generator

Close

Show Information Source

[Show All](#)

Show Information Source

Show Information Source

Show Information Source

Show Information Source

Show Information Source

Ok

Cancel

Retirement

Onalveic:

[<< Previous](#)

Unlock

Update

Fig. 93

William Windham v. Silicon Union, Corp.

Overview | Tasks | Proof Points

Damages List

Prior to Employment Change
Job/Salary History
Benefits
Other Income / Mitigation
Unemployment
Social Security

Damages | Players | Documents | Discovery Questions

Show All

Unemployment

Did Plaintiff apply for unemployment?

☒ Yes

☐ No

Explain:

Was unemployment granted?

☒ Yes

☐ No

Explain:

How much unemployment did Plaintiff receive?

US\$:

18000

Analysis

<< Previous

Next >>

Status: Not Started

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Fig. 94

TACTIX

Attorney Client Communication / Attorney Work Product

William Windham v. Silicon Union, Corp.

Calendar

Discovery Generator

Close

Overview | Tasks | Proof Points

Damages List

Prior to Employment Change

Job/Salary History

Benefits

Other Income / Mitigation

Unemployment

Social Security

Show All

Social Security

Did Plaintiff apply for social security?

☒ Yes

☐ No

Explain:

Was social security granted?

☐ Yes

☐ No

Explain:

Has Plaintiff received any other income since the employment change?

☒ Yes

☐ No

Analysis

Status: Not Started

Resources

Associate

Reviewers

Partner

Done?

Done?

Done?

View Log

Unlock

Update

Jury Theme: Plaintiff lied on his job application.

Vinnie 1.1.0.8

Fig. 95

TACTIX™

Attorney Client Communication / Attorney Work Product

William Windham v. Silcon Union, Corp.

Overview | Tasks | Prof Points | Damages | Players | Documents | Discovery Questions

Name	Role	Primary Contact
Bartelli, Steve	In-House	No
Clemens, Jonathan	In-House	No
Cole, Edith	In-House	Yes
Dorn, Nicholas	In-House	No
Erwin, Blane	Case Administ...	No
Heaton, Ryan	Defendant	No
Heaton, Ryan	Comparator	No
Hyland, Yvonne	In-House	No
Miraglia, Vincent	Partner	No
Neill, Larry	Associate	No
Pendleton, Ralph	Defendant	No
Ricci, Howard	Partner	Yes
Schäfer, Madeline	Partner	No
Suffolk, Charles	Defendant	No
Tavarez, Teresa	Paralegal	No
Windham, William	Plaintiff	No

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 • 2897 Porcelli Road
 • San Ramon, CA-94583

Calendar | Discovery Generator | Close

Search:

Edit | New | Delete

Version 1.1.0.8

Jury Theme: Plaintiff lied on his job application.

Fig. 96

TACTIX™

William Windham v. Silicon Union, Corp.

Attorney Client Communication / Attorney Work Product

Overview | Tasks | Proof Points | Damages | Players | Documents | Discovery Questions

Name	Role	Primary Contact
Bartelli, Steve	In-House	No
Clemens, Jonathan	In-House	No
Cole, Edith	In-House	Yes
Dorn, Nicholas	In-House	No
Erwin, Blane	Case Administ...	No
Heaton, Ryan	Defendant	No
Heaton, Ryan	Comparator	No
Hyland, Yvonne	In-House	No
Miraglia, Vincent	Partner	No
Neill, Larry	Associate	
Pendleton, Ralph	Defendant	
Ricci, Howard	Partner	
Schaefer, Madeline	Partner	
Suffolk, Charles	Defendant	
Tavarez, Teresa	Paralegal	
Windham, William	Plaintiff	

Player []

Player:

Role:

<click box at right to select from list>

☐ Dispi
☐ Paralegal
☐ Associate
☐ Partner
☐ In-House
☐ Witness
☐ Plaintiff
☐ Defendant
☐ Comparator

Save

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♦ 2897 Porcelli Road
 ♦ San Ramon, CA 94583

Search:

Jury Theme: Plaintiff lied on his job application.

Winnie 1.1.0.8

Edit New Delete

Start | Inbox - Microsoft Outlook | Microsoft Word | Google - Microsoft Inter... | Microsoft PowerPoint... | Tactix - William Win... | 4:32 PM

Fig. 97

TACTIX™

Attorney Client Communication / Attorney Work Product

William Windham v. Silicon Union, Corp.

Calendar

Discovery Generator

Close

Overview | Tasks | Proof Points | Damages | Players | Documents | Discovery Questions

Name	Created By	Created Date
Comperator Worksheet.doc	Erwin, Blane	08/21/2003
FOIA Request	Erwin, Blane	08/14/2003
Test Document	Erwin, Blane	05/22/2003

Search:

Open Document

Edit

New

Delete

Vinnie 1.1.0.8

Jury Theme: Plaintiff lied on his job application.

Fig. 98

William Windham v. Silicon Union, Corp.

Overview | Tasks | Proof Points | Damages | Players | Documents | Discovery Questions

Calendar | Discovery Generator | Close

Category	Whom	Question
Agency Requests	Unemployment	Get transcript
Agency Requests	Unemployment Comp ...	Obtain job search records
Attorney Notes	HR Manager	What were the consequences of the conduct?
Attorney Notes	Lexis	Obtain research in California
Attorney Notes	Plaintiff's doctors	Obtain medical records
Client Requests	HR Manager	Obtain all written reports related to the filling out of the job application
Client Requests	HR Manager	What are the races of the QA staff at the SW unit site?
Deposition Questions	Plaintiff	Did you know that a college degree was a job requirement when you indica...
Deposition Questions	Plaintiff's Supervisor	Did you ever overhear Plaintiff discuss his educational background?
Interrogatories	Hospital	Ask about emotional issues over treatment
Requests for Production	Plaintiff	Please produce all W-2's
Witness Questions	HR Manager	Has anyone ever been terminated for lying on their job application?
Witness Questions	Plaintiff's Supervisor	Did plaintiff act concerned when you asked him to clarify his college educati...

Generate:

Interrogatories	Deposition Questions
Requests for Production	Witness Questions
Requests for Admissions	Agency Requests
Client Requests	
Attorney Notes	

Generate Report | Search:

Edit | New | Delete

Jury Theme: Plaintiff lied on his job application.

Vinnite 1.1.0.8

Fig. 99

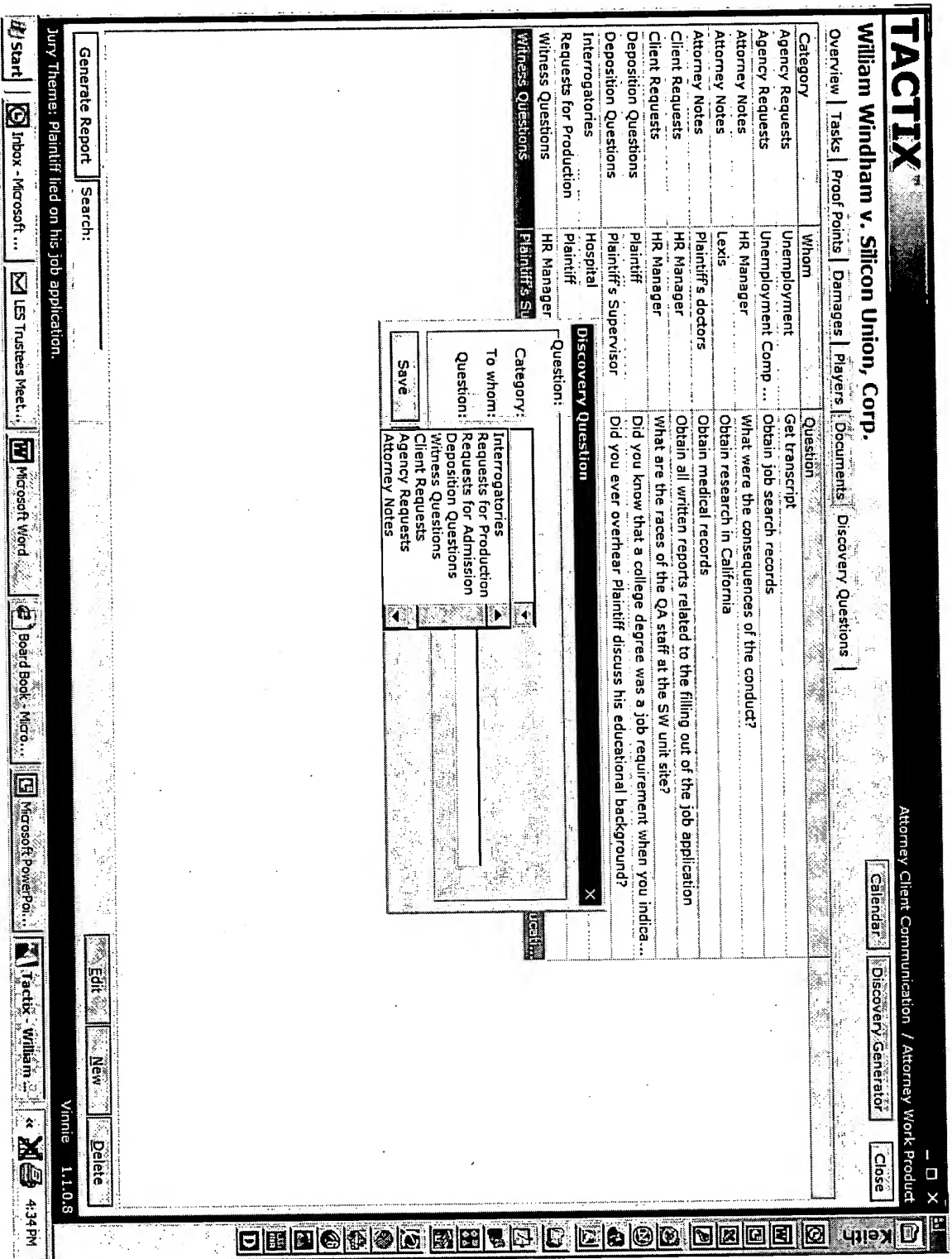


Fig. 100